



October 29, 2019

Willow MDP/DEIS Comments

c/o Racheal Jones, Project Coordinator Bureau of Land Management

Bureau of Land Management Alaska State Office

222 W 7th Avenue #13

Anchorage, AK 99513

RE: Support of Preferred Alternative B and Module Transfer Option 1, Draft Environmental Impact Statement for the Willow Master Plan Development
FR Doc. 2019–18839

Dear Ms. Jones:

The International Union of Operating Engineers (IUOE), the Laborers' International Union of North America (LiUNA!), the United Association of Plumbers and Pipefitters (UA), and the United Brotherhood of Carpenters and Joiners (UBC) respectfully submit the following comments regarding the Draft Environmental Impact Statement (DEIS) for the proposed Willow Master Development Plan (MDP) and the Bureau of Land Management (BLM) Preferred Alternative, Alternative B, and Module Transfer Option 1 in the National Petroleum Reserve-Alaska (NPR-A).

The four unions represent nearly 2-million workers, most of whom are employed in the construction industry in the United States and Canada. Our members possess specialized training and years of practical experience building the nation's energy and transportation infrastructure that powers and moves America, including such notable projects as the Hoover Dam, the Golden Gate Bridge, and the Trans-Alaska Pipeline. The four unions are major players in the North American energy industry.

The proposed Willow Project, a stand-alone development in the Bear Tooth Unit in the NPR-A, reliably and responsibly delivers American energy and job opportunities. The Project would provide significant employment opportunities for members of our four unions. If approved, construction would include a central processing facility, an operations center pad, a module transfer island, up to 38.2 miles of gravel roads, up to 698.8 total miles of ice roads during construction and up to 225.4 total miles of resupply ice roads during operations, 1 to 2 airstrips, up to 336.5 miles of pipelines, and a gravel mine site. As referenced in the DEIS, the project could support over 300 permanent jobs while construction could employ 2,000 workers with an estimated 10 million construction hours. Relying heavily on the skilled craftworkers of our unions, these jobs pay family-sustaining wages and offer strong health and pension benefits. These jobs increase the standards of living for Alaskan workers and strengthen Alaskan communities. And the BLM estimates that Willow could generate more than \$10 billion dollars in Federal, State, and North Slope Borough revenue.

Alaska relies heavily on revenue from North Slope oil production, which has, generally speaking, seen a steady decline in production since its peak in 1988. The Project would help offset declines in production from North Slope oil fields – BLM estimates peak production of 130,000 barrels of oil per day and approximately yield 590 million barrels of oil over the Project's 30-year life. This increase in production will not only benefit the Alaskan economy, but will also keep a key piece of U.S. energy infrastructure, the Trans-Alaska Pipeline System (TAPS), economically viable. The estimated production rate from Willow would create a 20 percent increase over current TAPS throughput. Operating TAPS at reduced capacity compromises its integrity, exposes it to water damage, and reduces the useful life of a critical American energy asset.

Development of Willow maintains the original intent of the NPR-A to meet domestic energy demand and promote American energy independence and security. The NPR-A is a vital domestic energy source as forecasts predict a ten percent increase in energy demands over the next 25 years. Responsible development of NPR-A oil and gas resources will prove critical to meeting global energy demands despite the increase in alternative sources.

The Willow MDP is consistent with the BLM's issued Integrated Activity Plan (IAP) for the NPR-A and complies with all of its obligations under the National Environmental Policy Act. The proposed Project minimizes environmental impacts and maintains high standards for safety and emergency response.

ConocoPhillips has a long history of responsible development on the North Slope, setting the standard for safety, efficiency, and environmental stewardship. Implementing the latest industry technology and additional voluntary design considerations ensures development will not only meet strict State and Federal environmental protection requirements, but also minimize the impact to the environment, wildlife, and subsistence resources.

Extended reach drilling technology has decreased the size of drill site pads by 15-20 percent, dramatically reducing the footprint in the North Slope. Spacing considerations in road and pipeline construction facilitates caribou movement minimizing disturbance to vulnerable wildlife. The DEIS references over 270 mitigation efforts and concludes, in section 3.19, that the cumulative effects of the project will not have a significant impact on the natural and human environment.

In summary, the DEIS comprehensively outlines elaborate and well-proven pipeline construction mitigation measures, both required and voluntary, to ensure protection of the environment even within this challenging terrain. Alternative B would reduce environmental impacts compared to other alternatives by using less gravel fill, fresh water, and aircraft flights, while improving year-round access for local residents that rely on subsistence resources.

Members of the Carpenters, Laborers, Operating Engineers, and Plumbers and Pipefitters hope to put their skills and expertise to work building the Willow MDP Project. Their livelihoods depend on the determination made by the Bureau of Land Management and other state and federal agencies regarding authorization of the project. Based on the analysis contained in the DEIS, it is clear that the project represents no long-term significant adverse environmental impact to the environment.

For these reasons, our four unions recommend that the Bureau of Land Management selects Alternative B, Option 1 and issues a prompt record of decision for the Willow Project.

Thank you for your consideration.